

CITYSCAPE

Div. A Group Inc.

Policy, Practices, Procedure and Plan – Accessibility for Ontarians with Disabilities Act (January 1, 2014)

The *Accessibility for Ontarians with Disabilities Act, 2005* ("the AODA") is an Ontario Provincial Act with the purpose for organizations to develop, document, implement and maintain accessibility standards in order to achieve accessibility for persons with disabilities in Ontario, with respect to goods, services, employment, and transportation.

The purpose of this document is to communicate Cityscape's policy, practices, procedures and plans ("Policy" and/or "Plan") regarding AODA. This Policy applies to all employees of Cityscape including management, administration, customer service personnel, sales and marketing, service technicians and maintenance workers. The Policy/Plan document encompasses Cityscape's **Multi-Year Accessibility Plan** required under AODA outlining the organization's strategy to prevent and remove barriers and to meet the company's requirements under the Regulation. As required under AODA, the Plan will be reviewed and updated at least once every five years.

Part I: General Requirements, Statement of Commitment

Cityscape is committed to meeting the accessibility needs of persons with disabilities in a timely manner and to meeting its requirement required under the Act. Cityscape is also committed to becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals related to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with Cityscape. Cityscape's commitment includes providing an accessible environment for all persons with disabilities consistent and respectful of the principles of independence, integration, dignity and equality of opportunity as part of its ongoing Multi-Year Plan.

As part of its commitment, Cityscape will:

1. Establish, document, implement, maintain and post this Policy as it relates to providing our services to people with disabilities and update it at minimum every five years.
2. Ensure our practices are consistent with the principles of independence, integration, dignity and equality of opportunity.
3. Train our people responsible to develop this policy and who interact with customers, the public and/or third parties appropriately.
4. Establish and maintain a process to provide feedback on how we provide our services to people with disabilities and how we will respond to such feedback and provide information about this process in alternate formats upon request.

5. Communicate with a person with a disability in a manner that takes into account his or her disability.
6. Notify the public about the availability of accessible formats and communication supports.
7. Arrange for the provision of accessible formats and communications upon request to a person with a disability in format that takes into account the person's disability.
8. Allow people with disabilities who visit our site(s) to be accompanied by a guide dog or service animal.
9. Permit people with disabilities who use a support person to bring that person with them while accessing our products or services.
10. Allow people to use their own personal assistive devices and make available other measures to enable access to our services.

Part II: Information and Communication Standards

(a) Feedback (to be effective in full by January 1, 2015)

Cityscape will ensure that its processes for receiving and responding to feedback are made available to persons with disabilities, whether members of the public, clients, customers or employees, in an appropriate, accessible format or communication support, upon their request, and that members of the public are notified of the availability of such an option. Cityscape will review and document its feedback processes to ensure that it is accessible and make any changes necessary to ensure compliance by 2015. Please contact us by calling us at 613 726 7105 or email us through our Contact page on our website at www.cityscape.ca to provide us with any feedback regarding our Accessibility Policy or Plan.

(b) Accessible Formats and Communication Supports (to be effective in full by January 1, 2016)

Cityscape will, upon request and consultation, endeavour to provide information and communications under our control about our goods and services to people with disabilities using the appropriate accessible format or communication support wherever possible, in a timely manner and on par with the fee charged to others for the same information. Cityscape will notify the public about the availability of accessible formats and communications supports. Cityscape will review and determine its current offerings of accessible formats and communications supports and will engage in an ongoing process of identifying additional accessible formats and communications supports that may be offered by Cityscape.

(c) Accessible Websites and Web Content

Cityscape is pleased to confirm that all of its websites and content are in conformance with Web Content Accessibility Guidelines (WCAG) 2.0 Level A as of January 1, 2014, as practicable.

Cityscape will ensure its websites, content, and applications directly controlled by Cityscape or through its contractual relationships, will be in conformity with WCAG 2.0 Level AA, as required by January 1, 2021, as practicable.

Part III. Employment Standards (to be effective in full by January 1, 2016)

(a) Recruitment

Cityscape will notify its employees and external applicants about the availability of accommodation for applicants with disabilities in its recruitment process.

(b) Recruitment, Assessment or Selection Process

Cityscape will ensure that job applicants are notified when they are individually selected to participate in the assessment or selection process and that accommodation for disabilities are made available upon request in relation to the materials or processes to be used. Cityscape will consult with individuals who request accommodations and will provide for appropriate accommodations.

(c) Notice to Successful Applicants

When making offers of employment, Cityscape will notify the successful applicant of its policies for accommodating employees with disabilities.

(d) Informing Employees of Supports

Cityscape will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

(e) Accessible Formats and Communication Supports for Employees

Upon request of an employee with a disability, Cityscape will consult with the employee to provide, or arrange for accessible formats and communication supports for information that is needed to perform his/her job, and information that is available to other employees. In order to determine the suitability of an accessible format or communication support, Cityscape will consult with the employee making the request. Accessible formats and communications supports regarding general workplace information will also be provided to employees with disabilities.

(f) Workplace Emergency Response Information

Cityscape will provide employees with disabilities individualized workplace emergency response information when the employee's disability is such that the information is required and Cityscape has been informed of the need to accommodate the employee's disability.

(g) Documented Individual Accommodation Plans

Cityscape currently accommodates the needs of its employees with disabilities as required under the Ontario Human Rights Code. Cityscape will develop individualized accommodation plans for its employees with disabilities, as Cityscape is made aware. The process by which Cityscape will consult, develop, determine, document, review and routinely update the individualized accommodation plan will be formalized. Cityscape will implement and maintain measures effective to maintain the privacy of its employees with disabilities.

(h) Return to Work Process

Cityscape will maintain a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work. The return to work process will clearly define and outline the steps Cityscape will take to facilitate the return to work and will include documented accommodation plans for each individual as part of the process. The above stated return to work process will not replace, hinder or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997).

(i) Performance Management, Career Development and Advancement and Redeployment

Cityscape will continue to consider the accessibility needs of employees with disabilities as well as individual accommodation plans, when conducting performance management reviews, providing career development and advancement to employees and when redeploying employees.

Administration and Feedback

If you have any questions, concerns and/or feedback about this policy or its related plans, practices or procedures please email us through our Contact page on our website at www.cityscape.ca or call us at 613-726-7105.

Customer Service Principle, Practices, Procedures and Definitions

(This section will be used to support communication and training)

Accessible Customer Service Principles

Dignity: The principle of respecting the dignity of a person with a disability means treating them as customers and clients who are as valued and as deserving of high quality and timely service as any other customer. Persons with disabilities are not treated as an afterthought or forced to accept lesser service, quality or convenience. The delivery of goods and services must take into account how persons with disabilities can effectively access and use them.

Equal Opportunity: Equal opportunity means having the same chances, options, benefits and results as others. In the case of services it means that persons with disabilities have the same opportunity as others to obtain, use and benefit from the way goods or services are provided. They should not have to make significantly more effort to access or obtain services. They should also not have to accept lesser quality or more inconvenience.

Independence: In some instances, independence means freedom from control or influence of others -- freedom to make one's own choices. In other situations, it may mean the freedom to do things in one's own way. People who may move or speak more slowly or differently must not be denied an opportunity to participate in a program or service because of this. Staff must allow persons with disabilities to take the time they need, without rushing them or taking over a task for them if someone prefers to do it themselves in their own way.

Integration: The provision of goods or services to persons with disabilities and others must be integrated to allow persons with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, programs and services including practices and procedures are designed to be accessible to everyone, including persons with disabilities.

Practices and Procedures:

(1) The Provision of Goods and Services to Persons with Disabilities

Cityscape will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

Best Practices: Cityscape employees and representatives will be encouraged to be pro-active in seeking solutions and removing barriers, as well as alerting all customers to the range of accommodations that are available.

The term "persons with disabilities" will be the norm, and if a specific condition must be referenced, the condition will be referenced last (e.g., person with low vision). The following are some general tips that may help make communication and interaction with or about people with all types of disabilities more successful:

- Remember to put people first. It is proper to say person with a disability, rather than disabled person or the disabled.
- It is best to wait until an individual describes his or her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and assumptions may be wrong.

When Cityscape bills for services, it should demonstrate a commitment to providing accessible invoices to all of our customers. This means that invoices should be provided in alternate formats upon request (e.g., hard copy, large print, email) and that staff is prepared to answer questions customers may have about the content of the invoice.

(2) Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Cityscape. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Best Practices: Every employee who interacts with customers/clients or other third parties will be trained on how to assist with various assistive devices, should their assistance be required.

(3) Guide Dogs and Service Animals

A customer with a disability that is accompanied by a guide dog or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails. If a guide dog or service animal is excluded by law, Cityscape will try to offer alternative methods to enable the person with a disability to access goods and services, when possible.

Recognizing a Guide Dog and/or Service Animal: If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Cityscape may request verification from the customer. Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal: The customer/client that is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all time.

(4) Allergies

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, Cityscape will make all reasonable efforts to meet the needs of all individuals.

Best Practices: Employees will be prepared to respond to requests of water for the service animal and to show the owner an outdoor area where the animal can be taken to relieve itself.

(5) Support Persons

If a customer/client with a disability is accompanied by a support person, Cityscape will ensure that both persons are allowed to enter the premises together and that the customer/client is not prevented from having access to the support person. All customer/client confidentiality requirements and practices will also apply to support persons.

(6) Training

Training will be provided to all employees who deal with the public; revised training will be provided in the event of changes to legislation or Cityscape's policy, practice and procedure. Cityscape will keep a record of training that includes the dates training was provided, the number of employees and names of employees trained.

The training will include information on the purposes of the AODA, requirements of this Service Regulation, how to communicate and interact with people with disabilities, how to interact with service animal or support person, how to utilize assisted devices that are available at our premises, what to do if a person has difficulty accessing Cityscape services or facilities, and our policies, procedures and practices pertaining to providing accessible customer service to people with disabilities.

(7) Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Cityscape. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Best Practices: Any service disruption will take top priority and Cityscape employees will check to ensure no one is tapped or stuck because of the disruption.

The notice should include statement of regret and include date.

(8) Feedback Process

Cityscape shall provide customers/clients with the opportunity to provide feedback on the service provided to persons with disabilities. Information about the feedback process will be readily available to all customers/clients and notice of the process will be made available at location reception. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written or email) will be available upon request.

Best Practices: Customers/clients will be informed about the feedback process and how action will be taken if a complaint is received. Cityscape will acknowledge verbal/written/telephone feedback within two business days, and within fifteen business days of the receipt of a mailed/e-mailed complaint. In some cases, it may not be possible or appropriate to acknowledge feedback, for example, if the customer wishes to remain anonymous, or indicates that he/she does not want to receive an acknowledgment. Feedback can be submitted through Cityscape's website at www.cityscape.ca or by calling us at 613 726 7105.

(9) Availability and Format of Documents (Alternative Formats)

All documents required by the Accessibility Standards for Customer Service, including Cityscape's Accessibility Policy, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to the Freedom of Information and Protection of Privacy Act ("FIPPA"). When providing these documents to a person with a disability, Cityscape will endeavour to provide the document, or the information contained in the document, in a format that takes the person's disability into account. Notice of the availability of documents required by the Accessibility Standards for Customer Service will be posted on Cityscape's website at: <http://www.cityscape.ca>

Cityscape shall notify customers that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Cityscape, the website and/or any other reasonable method. In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Definitions:

Accessible Formats: include, but are not limited to accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

Assistive Device: a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that members and guests bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Barrier: as defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. This includes:

- a physical barrier,
- an architectural barrier,
- an informational or communications barrier,
- an attitudinal barrier,
- a policy, practice and procedure barrier.

Communication Supports: include but are not limited to sign language, plain language and other communication supports that facilitate effective communications.

Disability: a key feature of the AODA is its definition of "disability". Under the AODA, the definition of "disability" is the same as the definition in the Ontario Human Rights Code:

Any degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:

- Diabetes mellitus;
- Epilepsy;
- A brain injury;
- Any degree of paralysis;
- Amputation;
- Lack of physical coordination;
- Blindness or visual impediment;
- Deafness or hearing impediment;
- Muteness or speech impediment; or
- Physical reliance of a guide dog or other animal, or on a wheelchair or other remedial appliance or device.
- A condition of mental impairment or a developmental disability.
- A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- A mental disorder.

- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety & Insurance Act, 1997.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go. This is a broad definition, and one that must be considered closely when educating our employees in the appropriate response to our customers.